Michigan Department of Treasury 496 (02/06) Auditing Procedures Report

			2 of 1968, as		POT (ad P.A. 71 of 1919	, as amended.						
			vernment Typ	е			Local Unit Nan		County			
	Coun	<u> </u>	City	□Twp	□Village	⊠Other	St. Louis F	lousing Commission		Gratiot		
	al Yea ne 3	0, 20	107		Opinion Date December	10 2007		Date Audit Report Submi				
					December	10, 2007		December 17	, 2007			
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					enal, no resp ments and rec			sed in the financial state	ments, inclu	ding the notes, or in the		
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	Ϋ́E	S N					ee instructions for further detail.)					
1.	X		All require reporting	ed compoi entity note	nent units/fund es to the financ	ls/agencies cial stateme	of the local uents as neces	init are included in the fi sary.	nancial state	ements and/or disclosed in the		
2.	X		There are (P.A. 275	no accun of 1980)	nulated deficits or the local ur	s in one or a nit has not e	more of this u exceeded its b	init's unreserved fund ba oudget for expenditures.	ılances/unre	stricted net assets		
3.	X		The local	unit is in o	compliance wit	h the Unifo	rm Chart of A	ccounts issued by the E	epartment c	of Treasury.		
4.	\times		The local	unit has a	dopted a budg	get for all re	equired funds.					
5.	X		A public h	nearing on	the budget wa	as held in a	ccordance wi	th State statute.				
6.	×				ot violated the				ne Emergen	cy Municipal Loan Act, or		
7,	X		The local	unit has n	ot been deling	uent in dist	tributing tax re	evenues that were collec	cted for anot	her taxing unit.		
8.	\boxtimes							/ with statutory requirem		3 * * * *		
9.	\boxtimes		The local	unit has n	o illegal or una	authorized	expenditures	that came to our attentions of (see Appendix H of B	on as defined	d in the <i>Bulletin for</i>		
10.	X		There are that have	no indica	tions of defalc previously cor	ation, fraud nmunicated	l or embezzle I to the Local	ment, which came to ou	r attention d	uring the course of our audit If there is such activity that has		
11.	X		The local	unit is free	of repeated of	comments f	from previous	years.				
12.	X		The audit	opinion is	UNQUALIFIE	D.						
13.	X				omplied with (GASB 34 as	modified by MCGAA St	atement #7	and other generally		
14.	X	П	•		•	•	rior to pavmer	nt as required by charter	or statute.			
15.	X							d were performed timely				
inclu des	ided criptic	in th on(s)	of governr nis or any of the auth	ment (auth other auc hority and	norities and co	mmissions do they ot n.	included) is obtain a stand-	operating within the bou- alone audit, please en	indaries of t	he audited entity and is not ame(s), address(es), and a		
We	have	enc	losed the	following	12	Enclosed	Not Require	d (enter a brief justification)				
Fina	ancia	l Sta	tements			\boxtimes						
The letter of Comments and Recommendations				mmendations		None	None					
Other (Describe)												
			ccountant (Fir	rm Name)		1 ,		Telephone Number (989) 799-9580				
	t Addi		, PO B9	k 2025/	1			City Saginaw	State MI	Zip 48605		
	1	AND	Signature		-/ $-$	Pri	nted Name		License Nu			
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St. Louis, Michigan

Financial Statements and Single Audit Report

For the Year Ended June 30, 2007



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INDEPENDENT AUDITORS' REPORT

December 10, 2007

Board of Directors St. Louis Housing Commission St. Louis, Michigan

We have audited the accompanying financial statements of the business-type activities and each major fund of the St. Louis Housing Commission, as of and for the year ended June 30, 2007, which collectively comprise the Commission's basic financial statements as listed in the table of contents. These financial statements are the responsibility of the Housing Commission's management. Our responsibility is to express opinions on these financial statements based on our audit.

We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in Government Auditing Standards, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinions.

In our opinion, the financial statements referred to above present fairly, in all material respects, the respective financial position of the business-type activities and each major fund of St. Louis Housing Commission, as of June 30, 2007, and the respective changes in financial position and cash flows for the year then ended in conformity with accounting principles generally accepted in the United States of America.

In accordance with Government Auditing Standards, we have also issued our report dated December 10, 2007 on our consideration of the St. Louis Housing Commission's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* and should be considered in assessing the results of our audit.

The Management's Discussion and Analysis listed in the table of contents on pages 3-8 is not a required part of the basic financial statements but is supplementary information required by the Governmental Accounting Standards Board. We have applied certain limited procedures, which consisted principally of inquiries of management regarding the methods of measurement and presentation of the supplementary information. However, we did not audit the information and express no opinion on it.

Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise *St. Louis Housing Commission's* basic financial statements. The financial data schedules are presented for purposes of additional analysis and are not a required part of the basic financial statements. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by U.S. Office and Management and Budget Circular A-133, *Audits of State, Local Governments, and Non-Profit Organization*, and is also not a required part of the financial statements of the Housing Commission. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements and, in our opinion, is fairly presented in all material respects in relation to the basic financial statements taken as a whole.

Rehmann Lohan

MANAGEMENT'S DISCUSSION AND ANALYSIS

Management's Discussion and Analysis

The management discussion and analysis of the St. Louis Housing Commission's financial statements includes a narrative overview and discussion of the financial activities of the Housing Commission for the year ending June 30, 2007. Since the MD&A is designed to present basic financial information in a narrative, executive summary format, the reader is encouraged to consider the information presented here in conjunction with the Housing Commission's audited financial statements.

Financial Highlights

- Assets exceed liabilities at the close of the most recent fiscal year by \$1,775,557 (net assets). Of this amount, \$456,865 may be used to meet the Housing Commission's continuing obligations.
- Capital Assets increased \$156,677 without the implication of accumulated depreciation.
- Housing Commission revenues increased by \$19,140 excluding Capital Funds dollars.
- The collective effect on operating expense of 2006 vs. 2007 was a 5% decrease.

St. Louis Housing Commission's Statement of Net Assets

	Business-type Activities		
	2006	2007	
Current and other assets	\$ 483,635	\$ 555,564	
Capital assets	1,282,913	1,318,692	
Total assets	1,766,548	1,874,256	
Accounts payable and accrued expenses	52,152	75,807	
Non-current liabilities	21,970	22,892	
Total liabilities	74,122	98,699	
Net assets:			
Invested in capital assets	1,282,913	1,318,692	
Unrestricted	409,513	456,865	
Total not assets	¢ 1 602 426	¢ 1 775 557	
Total net assets	\$ 1,692,426	\$ 1,775,557	

Major Factors affecting the statement of Net Assets

Total Assets for FYE 2006 are \$1,766,548 and at FYE 2007 the amount was \$1,874,256. This represents an increase of \$107,708 for which the major reason was the recording of the net pension asset for 2007 and the additions of various capital assets.

Accounts payable and accrued expenses increased by \$24,127 from 2006 to 2007 with the reason being timing issues related to payment of products and services received and rendered.

Non-current liabilities increased by \$922 from 2006 to 2007 with the reason being an increase in hourly wages having an effect on the long-term portion of accrued sick and vacation liability.

Net Assets increased by \$83,131 from 2006 to 2007 with the reason being additions to the capital assets and the addition of the net pension asset.

St. Louis Housing Commission's Change in Net Assets

	Business-type Activities				
	2006	2007			
Revenues:					
Public housing rental	\$ 143,459	\$ 143,755			
HUD operating subsidy	744,236	758,753			
HUD capital fund	7,713	160,875			
Other	1,849	949			
Unrestricted investment earnings	7,486	9,285			
Total revenues	904,743	1,073,617			
Expenses:					
Administration	157,828	160,304			
Tenant services	55	253			
Utilities	86,373	79,143			
Maintenance	161,497	124,134			
Casualty loss	-	410			
Housing assistance payments	436,891	470,583			
Depreciation	169,043	125,446			
Miscellaneous	31,961	30,213			
Total expenses	1,043,648	990,486			
Change in net assets	(138,905)	83,131			
Net assets, beginning of year	1,831,331	1,692,426			
Net assets, end of year	\$ 1,692,426	\$ 1,775,557			

Major Factors affecting the statement of Net Assets:

Maintenance decreased because during the prior year the Commission renovated three rental units and had no such renovations in the current year.

The increase in the housing assistance payments was due to an increase in the number of participants that the commission was able to assist under the Housing Choice Voucher Program.

Some of the Commission's capital assets became fully depreciated in 2006. This caused a decrease in the 2007 depreciation expense.

The major impact to revenues for 2007 was the increase in the amount of capital funds utilized during the year.

Overview of Financial Statements

The MD&A is specifically designed to: 1.) assist the reader in focusing on significant financial issues; 2.) provide a broad scope overview of the Housing Commission's financial activities; 3.) identify and explain changes in the Housing Commission's financial position from 2006 to 2007; and 4.) highlight any individual funding source issues or concerns. This report also contains other supplemental information in addition to the basic financial statements themselves demonstrating how projects funded by HUD have been completed.

This MD&A is intended to serve as an introduction to the Housing Commission's basic financial statements. The Housing Commission is a blended component unit of the City of St. Louis, engaged in business-type activities. Accordingly, only fund financial statements are presented as the basic financial statements, comprised of two components: (a) fund financial statements and (b) a series of notes to the financial statements. These provide information about the activities of the Housing Commission as a whole and present a longer-term view of the Housing Commission's finances.

Reporting On The Housing Commission As A Whole

One of the most important questions asked about the Commission's finances are, "Is the Housing Commission as a whole better off, or worse off, as a result of the achievements of fiscal year 2007?" The Statement of Net Assets and the Statement of Revenues, Expenses, and Changes in Net Assets report information about the Housing Commission as a whole and about its activities in a way that helps answer this question. These statements include all assets and liabilities using the accrual basis of accounting, which is similar to the accounting used by most private-sector companies. All of the current year's revenues and expenses are taken into account regardless of when cash is received or paid.

Fund Financial Statements

All of the funds of the Housing Commission are reported as proprietary funds. A *fund* is a grouping of related accounts that is used to maintain control over resources that have been segregated for specific activities or objectives. The Housing Commission, like other enterprises operated by state and local governments, uses fund accounting to ensure and demonstrate compliance with finance-related legal requirements.

The Housing Commission's financial statements report its net assets and changes in them. One can think of the Housing Commission's net assets - the difference between assets and liabilities - as one way to measure the Commission's financial health, or financial position. Over time, increases and decreases in the Authority's net assets are one indicator of whether its financial health is improving or deteriorating. One will need to consider other non-financial factors, however, such as the changes in the Commission's occupancy levels or its legal obligations to HUD, to assess the overall health of the Housing Commission.

Annual Report Using This

The Housing Commission's annual report consists of financial statements that show combined information about the Housing Commission's most significant funds, the Low Rent Housing Program, Section 8 Housing Choice Voucher Program and Public Housing Capital Fund Program.

The Housing Commission auditors provided assurance in their independent auditors' report, located immediately preceding the MD&A, that the basic financial statements are fairly stated. The auditors provide varying degrees of assurance regarding the other information included in this report. A user of this report should read the independent auditors' report carefully to determine the level of assurance provided for each of the other parts of this report.

Reporting The Housing Commission's Most Significant Funds

The Housing Commission's financial statements provide detailed information about the most significant funds. Some funds are required to be established by the Department of Housing and Urban Development (HUD). However, the Housing Commission establishes other funds to help it control and manage money for particular purposes, or to show that it is meeting legal responsibilities for using grants and other money.

The Housing Commission's enterprise funds use the following accounting approach for Proprietary funds. All of the Housing Commission's services are reported in enterprise funds. The focus of proprietary funds is on income measurement, which, together with the maintenance of net assets, is an important financial indicator. The statements evaluated include:

• Statement of Net Assets – reports the Housing Commission's current financial resources (short term spendable resources) with capital assets and long-term debt obligations.

- Statement of Revenues, Expenses, and Changes in Fund Net Assets reports the Housing Commission's operating and non-operating revenues, by major source along with operating and non-operating expenses.
- Statement of Cash Flows reports the net change in cash and cash equivalents during the year, by operating activities, noncapital financing activities, capital and related financing activities, and investing activities.

The following analysis of the entity wide financial statement is provided to assist the reader of our financial statements.

The SLHC maintains its books and records utilizing the accrual basis of accounting. Accrual accounting recognizes revenues and expenses when earned regardless of when cash is received or paid.

The following is a description of the programs and services that the authority provides for the residents of the St. Louis Housing Commission:

Low Income Public Housing

The SLHC owns approximately 80 units in two developments in the City of St. Louis. The 80 units owned by the Commission consist of family units. The Commission is responsible for the management, maintenance and utilities for all units and sites. On an annual basis, the Commission submits a request for funding known as the Calculation of Operating Fund Subsidy. The basic concept of the Calculation of Operating Subsidy is that the Commission has an allowable Operating Expense Level, Allowable Utilities Expenses Level and Audit Costs that becomes the Commission's Total Allowable Expenses. HUD will fund the difference between the Total Allowable Expenses and the amount of rents that the Authority can charge their tenants based upon HUD eligibility calculation. The funds are utilized to provide safe, affordable, clean housing to the residents of the City of St. Louis, Michigan.

Section 8 Housing Choice Voucher Program

This grant program provides Housing Assistance Payments to Landlords who participate in the program. Qualifying tenants to the program have their income analyzed utilizing HUD's guidelines and their rents are assessed accordingly. The balance between the differences of the allowable rent amount set by HUD and the tenant's contribution is equal to the Housing Assistance Payment.

Capital Fund Program

This grant program is awarded by HUD on an annual basis. The purposes of this grant are to maintain the physical improvements of the Commission's sites and for administrative management to ensure those improvements are completed in the most effective and efficient manner. The Commission requisitions funds from HUD as the Commission expends funds.

Economic Factors

The Housing Commission's primarily dependent upon HUD for the funding of operations; therefore, the Housing Commission is affected more by Federal budget than by local economic conditions. The capital budgets for the 2008 fiscal year have already been submitted to HUD for approval and no major changes are expected.

The Capital fund programs are multiple year budgets and have remained relatively stable. Capital Funds are used for the modernization of public housing properties including administrative fees involved in the modernization.

Significant economic factors affecting the Commission are as follows:

- Federal funding provided by Congress to the Department of Housing and Urban Development.
- Local labor supply and demand, which can affect salary and wage rates.
- Local inflationary, recessionary and employment trends, which can affect resident incomes and therefore the amount of rent.
- Income inflationary pressure on utility rates, supplies and other costs.

Requests for Information

This financial report is designed to provide a general overview of the Commission's finances. Questions concerning any of the information provided in this report or requests for additional financial information should be addressed to the St. Louis Housing Commission Executive Director, 308 S. Delaware Street, PO Box 117, Saint Louis, Michigan 48880.

BASIC FINANCIAL STATEMENTS

ST. LOUIS HOUSING COMMISSION STATEMENT OF NET ASSETS JUNE 30, 2007

ASSETS	
Current assets:	
Cash and cash equivalents	\$ 485,618
Accounts receivable, net	33,424
Accrued interest	25
Prepaid expenses and other assets	 36,497
Total current assets	555,564
Capital assets:	
Property and equipment, net	 1,318,692
Total assets	 1,874,256
LIABILITIES	
Current liabilities:	
Accounts payable	34,159
Accrued compensated absences	13,142
Accrued liabilities	12,095
Due to other governmental units	3,021
Unearned revenue	671
Tenant security deposits	 12,719
Total current liabilities	75,807
Non-current liabilities:	
Accrued compensated absences	 22,892
Total liabilities	 98,699
NET ASSETS	
Invested in capital assets	1,318,692
Unrestricted	456,865
	 100,000
Total net assets	\$ 1,775,557

ST. LOUIS HOUSING COMMISSION STATEMENT OF REVENUES, EXPENSES AND CHANGES IN NET ASSETS FOR THE YEAR ENDED JUNE 30, 2007

OPERATING REVENUES	
Net tenant rental revenue	\$ 143,755
HUD capital grants	160,875
HUD operating subsidies	758,753
Other	 949
Total operating revenues	1,064,332
OPERATING EXPENSES	
Administrative	160,304
Tenant services	253
Utilities	79,143
Ordinary maintenance and operation	124,134
General expenses	25,950
Extraordinary maintenance	410
Housing assistance payments	470,583
Bad debt expense	3,888
Depreciation	 125,446
Total operating expenses	990,111
Operating income	 74,221
NON-OPERATING REVENUE (EXPENSE)	
Loss on sale of capital assets	(375)
Interest income	9,285
Total non-operating revenue (expense)	8,910
Change in net assets	83,131
Net assets, beginning of year	 1,692,426
Net assets, end of year	\$ 1,775,557

ST. LOUIS HOUSING COMMISSION STATEMENT OF NET ASSETS PROPRIETARY FUNDS JUNE 30, 2007

	Public Housing Low Rent Program	Public Housing Capital Fund Program	Housing Choice Vouchers Program	Total	
ASSETS					
Current assets:					
Cash and cash equivalents	\$ 255,184	\$ -	\$ 230,434	\$ 485,618	
Accounts receivable	3,828	30,000	-	33,828	
Allowance for doubtful accounts	(404)	-	-	(404)	
Accrued interest	-	-	25	25	
Interprogram receivable	30,000	-	2,054	32,054	
Prepaid expenses and other assets	29,480		7,017	36,497	
Total current assets	318,088	30,000	239,530	587,618	
Capital assets:					
Property and equipment, net	1,145,461	173,231		1,318,692	
Total assets	1,463,549	203,231	239,530	1,906,310	
LIABILITIES					
Current liabilities:					
Accounts payable	33,796	-	363	34,159	
Accrued compensated absences	9,404	-	3,738	13,142	
Accrued liabilities	9,037	-	3,058	12,095	
Due to other governmental units	3,021	-	-	3,021	
Interprogram payable	2,054	30,000	-	32,054	
Unearned revenue	671	-	-	671	
Tenant security deposits	12,719			12,719	
Total current liabilities	70,702	30,000	7,159	107,861	
Non-current liabilities					
Accrued compensated absences	16,991		5,901	22,892	
Total liabilities	87,693	30,000	13,060	130,753	
NET ASSETS					
Invested in capital assets	1,145,461	173,231	-	1,318,692	
Unrestricted	230,395		226,470	456,865	
Total net assets	\$ 1,375,856	\$ 173,231	\$ 226,470	\$ 1,775,557	

ST. LOUIS HOUSING COMMISSION STATEMENT OF REVENUES, EXPENSES AND CHANGES IN NET ASSETS FOR THE YEAR ENDED JUNE 30, 2007

	L	lic Housing ow Rent Program	Public Housing Capital Fund Program		Choic	Iousing e Vouchers rogram	Total	
OPERATING REVENUE								
Net tenant rental revenue	\$	143,755	\$	-	\$	-	\$ 143,755	
HUD capital grants		-		160,875		-	160,875	
HUD operating subsidies		202,816		20,027		535,910	758,753	
Other		949					949	
Total operating revenue		347,520		180,902		535,910	1,064,332	
OPERATING EXPENSES								
Administrative		85,195		4,881		70,228	160,304	
Tenant services		253		-		-	253	
Utilities		79,143		-		-	79,143	
Ordinary maintenance and operation		119,174		4,960		-	124,134	
General expenses		24,924		-		1,026	25,950	
Casualty loss		410		-		-	410	
Housing assistance payments		-		-		470,583	470,583	
Bad debt expense		3,888		-		-	3,888	
Depreciation		122,159		2,758		529	125,446	
Total operating expense		435,146		12,599		542,366	990,111	
Operating income		(87,626)		168,303		(6,456)	74,221	
NON-OPERATING REVENUE (EXPENSES)								
Loss on sale of capital assets		(375)		-		-	(375)	
Interest income		8,645				640	9,285	
Total non-operating revenue (expenses)		8,270				640	8,910	
Income (loss) before transfers		(79,356)		168,303		(5,816)	83,131	
Transfers in		10,186		-		-	10,186	
Transfers out				(10,186)			(10,186)	
Change in net assets		(69,170)		158,117		(5,816)	83,131	
Net assets, beginning of year		1,445,026		15,114		232,286	1,692,426	
Net assets, end of year	\$	1,375,856	\$	173,231	\$	226,470	\$ 1,775,557	

ST. LOUIS HOUSING COMMISSION STATEMENT OF CASH FLOWS FOR THE YEAR ENDED JUNE 30, 2007

	L	lic Housing Low Rent Program	Ca	lic Housing pital Fund Program	Choi	Housing ce Vouchers Program	_	Total
Cash flows from operating activities:								
Cash received from customers and others	\$	347,963	\$	150,902	\$	535,909	\$	1,034,774
Cash received from interfund services provided		- (20, 222)		30,000		322		30,322
Cash payments for interfund services used		(30,322)		- (4.001)		-		(30,322)
Cash payments to employees		(87,673)		(4,881)		(67,144)		(159,698)
Cash payments to suppliers for goods and services		(221,360)		(4,960)		(478,662)		(704,982)
Net cash provided by (used in) operating activities		8,608		171,061		(9,575)		170,094
Cash flows from non-capital financing activities:								
Transfers in		10,186		-		-		10,186
Transfers out				(10,186)				(10,186)
Net cash provided by (used in) non-capital financing activities		10,186		(10,186)				
Cash flows (used in) provided by capital and related financing act	ivitie	s:						
Acquisition of capital assets		(725)		(160,875)				(161,600)
Cash flows provided by investing activities:								
Interest received		8,645		-		640		9,285
Net increase (decrease) in cash and cash equivalents		26,714		-		(8,935)		17,779
Cash and cash equivalents, beginning of year		228,470				239,369		467,839
Cash and cash equivalents, end of year	\$	255,184	\$		\$	230,434	\$	485,618
Reconciliation of operating income (loss) to net								
cash provided by operating activities								
Operating income (loss)	\$	(87,626)	\$	168,303	\$	(6,456)	\$	74,221
Adjustments to reconcile operating income (loss)								
to net cash provided by (used in) operating activities:								
Depreciation		122,159		2,758		529		125,446
(Increase) decrease in assets								
Accounts receivable		443		(30,000)		(1)		(29,558)
Due from other funds		(30,000)		-		322		(29,678)
Prepaid expenses		(17,575)		-		(7,017)		(24,592)
Increase (decrease) in liabilities						, a		
Accounts payable		24,309		-		(36)		24,273
Accrued liabilities		(2,478)		-		3,084		606
Due to other funds		(322)		30,000		-		29,678
Deposits		498		-		-		498
Unearned revenue		(800)		-				(800)
Net cash provided by (used in) operating activities	\$	8,608	\$	171,061	\$	(9,575)	\$	170,094

NOTES TO FINANCIAL STATEMENTS

FOR THE YEAR ENDED JUNE 30, 2007

I. SUMMARY OF SIGNIFICANT ACCOUNT POLICIES

A. REPORTING ENTITY

The St. Louis Housing Commission (the "Commission") is a blended component unit of the City of St. Louis, Michigan (the "City") as defined by the Governmental Accounting Standards Board's (GASB) Statement No. 14, The Financial Reporting Entity and Statement of Michigan Governmental Accounting and Auditing No. 5, which define the reporting of primary government and component unit activities. The basic criterion for being considered a component unit is the exercise of financial responsibility over such a unit by a primary government, the appointment of the unit's governing board by a primary government, the designation of management by a primary government, or the ability to exert significant influence on the budget and operations of the unit by a primary government. As a result of being identified as a component unit, the Commission's financial records have been included as a blended component unit in the financial statements of the City of St. Louis.

The Commission reports as a business-type activity, as defined by the Governmental Accounting Standards Board Statement No. 34, with individual proprietary funds.

These financial statements include all activities of the Commission, which include a Low Income Housing Program (80 units) and a Housing Choice Vouchers Program (155 units). These programs receive subsidies and annual contributions from the Department of Housing and Urban Development ("HUD").

B. MEASUREMENT FOCUS AND BASIS OF ACCOUNTING

The economic resources measurement focus and the accrual basis of accounting are used in preparing the financial statements. Revenues are recorded when earned and expenses are recorded when a liability is incurred, regardless of the timing of related cash flows.

Proprietary funds distinguish *operating* revenues and expenses from *nonoperating* items. Operating revenues and expenses generally result from providing services and producing and delivering goods in connection with a proprietary fund's principal ongoing operations. The principal operating revenues of the Commission are federal grants and charges to customers for services. Operating expenses include housing assistance payments, administrative expenses, and depreciation on capital assets. All revenues and expenses not meeting this definition are reported as nonoperating revenues and expenses.

NOTES TO FINANCIAL STATEMENTS

FOR THE YEAR ENDED JUNE 30, 2007

The government reports the following major proprietary funds:

The *public housing low rent program fund* accounts for the revenue and related operations of the Public and Indian Housing grant program.

The *public housing capital fund program fund* accounts for the revenue and related purchases of capital assets of the Public Housing Capital Fund grant program.

The *housing choice vouchers program fund* accounts for the revenue and related operations of the Section 8 Choice Vouchers grant program.

Private-sector standards of accounting and financial reporting issued prior to December 1, 1989, generally are followed in the government-wide and proprietary fund financial statements to the extent that those standards do not conflict with or contradict guidance of the Governmental Accounting Standards Board. Governments also have the *option* of following subsequent private-sector guidance for their enterprise funds, subject to this same limitation. The Commission has elected not to follow subsequent private-sector guidance.

When both restricted and unrestricted resources are available for use, it is the Commission's policy to use restricted resources first, and then unrestricted resources as they are needed.

C. ASSETS AND LIABILITIES

Cash and Cash Equivalents

For the purpose of the statement of cash flows, the Commission considers all highly liquid investments with an original maturity of three months or less to be cash equivalents.

Receivables and payables

All receivables and payables are reported at their gross value and, where appropriate, are reduced by the estimated portion that is expected to be uncollectible.

Activity between the funds that are representative of lending/borrowing arrangements outstanding at the end of the fiscal year are referred to as either "due to/from other funds" (i.e., the current portion of interfund loans).

NOTES TO FINANCIAL STATEMENTS

FOR THE YEAR ENDED JUNE 30, 2007

Due To Other Governmental Units

This account represents the amount due to the City for the payment in lieu of taxes.

Prepaid items

Certain payments made to vendors are for services applicable to future accounting periods and are recorded as prepaid items in both the government-wide and fund financial statements.

Capital Assets

Capital assets, which include property, plant and equipment, are reported in the financial statements. Capital assets are defined by the Commission as assets with an initial, individual cost of more than \$200 and an estimated useful life in excess of one year. Such assets are recorded at historical cost or estimated historical cost if purchased or constructed. Donated capital assets are recorded at estimated fair market value at the date of donation.

The costs of normal maintenance and repairs that do not add to the value of the asset or materially extend assets lives are not capitalized.

Major outlays for capital assets and improvements are capitalized as projects are constructed. Interest incurred during the construction phase of capital assets of business-type activities is included as part of the capitalized value of the assets constructed. Capital assets of the Commission are depreciated using the straight line method over the following estimated useful lives:

Site improvements	5-20 years
Buildings	40 years
Building improvements	5-10 years
Nondwelling structures	5-40 years
Dwelling equipment – nonexpendable	7 years
Furniture and fixtures	3-10 years

Compensated Absences

The Commission records a liability for compensated absences for any employee with vacation or sick time which meets the requirements for recording of a liability.

NOTES TO FINANCIAL STATEMENTS

FOR THE YEAR ENDED JUNE 30, 2007

Use of Estimates

The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

II. DETAILED NOTES ON ALL FUNDS

A. DEPOSITS AND INVESTMENTS

A reconciliation of cash and cash equivalents as shown in the financial statements to the Commission's deposits is as follows:

		Total
Statement of Net Assets Caption: Cash and cash equivalents	<u>\$</u>	485,618
Notes to Financial Statements:		
Bank deposits	\$	485,618

Investment and deposit risk:

Interest Rate Risk. State law limits the allowable investments and the maturities of some of the allowable investments as identified in the following list of authorized investments. The Commission's investment policy does not have specific limits in excess of state law on investment maturities as a means of managing its exposure to fair value losses arising from increasing interest rates.

Credit risk. The Commission's investment policy does not have specific limits in excess of state law on investment credit risk. The Commission has no investments for which ratings are required.

NOTES TO FINANCIAL STATEMENTS

FOR THE YEAR ENDED JUNE 30, 2007

Custodial credit risk - deposits. Custodial credit risk is the risk that in the event of a bank failure, the Commission's deposits may not be returned. State law does not require and the Commission does not have a policy for deposit custodial credit risk. As of year end, \$286,146 of the Commission's bank balance of \$486,146 was exposed to custodial credit risk because it was uninsured and uncollateralized.

Statutory Authority:

- a. Bonds, securities, other obligations and repurchase agreements of the United States, or an agency or instrumentality of the United States.
- b. Certificates of deposit, savings accounts, deposit accounts or depository receipts of a qualified financial institution.
- c. Commercial paper rated at the time of purchase within the 2 highest classifications established by not less than 2 standard rating services and that matures not more than 270 days after the date of purchase.
- d. Bankers acceptances of United States banks.
- e. Obligations of the State of Michigan and its political subdivisions that, at the time of purchase are rated as investment grade by at least one standard rating service.
- f. Mutual funds registered under the Investment Company Act of 1940, limited to mutual fund securities whose intention is to maintain a net asset value of \$1.00 per share.
- g. External investment pools as authorized by Public Act 20 as amended through 12/31/97.

The Commission is authorized to designate depositories for Commission funds, and to determine that the funds are invested in accordance with State of Michigan statutory authority.

The Commission's deposits are in accordance with statutory authority.

NOTES TO FINANCIAL STATEMENTS

FOR THE YEAR ENDED JUNE 30, 2007

B. CAPITAL ASSETS

A summary of capital assets is as follows:

	Beginning Balance	Additions	Disposals	Ending Balance
Capital assets, not being depreciated Land	\$ 40,831	\$ -	\$ -	\$ 40,831
Construction in progress	φ 4 0,651	30,000	φ -	30,000
Total capital assets not being depreciated	40,831	30,000		70,831
Capital assets, being depreciated				
Site improvements	797,165	19,187	-	816,352
Buildings Building improvements	1,751,038 1,429,471	100,262	-	1,751,038 1,529,733
Nondwelling structures	217,232	100,202	-	217,232
Dwelling equipment -	,			,
nonexpendable	51,876	12,151	(4,923)	59,104
Furniture and fixtures	135,644			135,644
Total capital assets being				
depreciated	4,382,426	131,600	(4,923)	4,509,103
Less accumulated depreciation	(700 (14)	(12.212)		(7.42.027)
Site improvements Buildings	(730,614) (1,027,515)	(12,213) (43,776)	-	(742,827) (1,069,897)
Building improvements	(1,105,829)	(49,863)	-	(1,155,816)
Nondwelling structures	(141,974)	(5,681)	-	(147,654)
Dwelling equipment - nonexpendable	(37,115)	(4,872)	4,548	(37,438)
Furniture and fixtures	(97,297)	(9,042)	-,5-0	(107,610)
Total accumulated depreciation	(3,140,344)	(125,447)	4,548	(3,261,242)
Total capital assets being depreciated, net	1,242,082	6,153		1,247,861
Net capital assets	\$ 1,282,913	\$ 36,153	\$ (375)	\$ 1,318,692

NOTES TO FINANCIAL STATEMENTS

FOR THE YEAR ENDED JUNE 30, 2007

C. INTERFUND RECEIVABLES, PAYABLES AND TRANSFERS

	Due From					
				ısing		
		ıblic		oice		
	Housi	ing Low	Vou	chers		
Due To	R	lent	Pro	gram		Total
Housing Choice Vouchers Program	\$	-	\$	2,054	\$	2,054
Public Housing Capital Fund Program		30,000				30,000
	\$	30,000	\$	2,054	\$	32,054

The balance due between the funds is for reimbursement of expense paid for by one fund on behalf of the other fund.

	Ir	ansiers 10
		lic Housing
Transfers From	I	Low Rent
Public Housing Capital Fund Program	\$	10,186

The interfund transfer between the funds is the current year administration revenue earned in the Public Housing Capital Fund Program

D. COMPENSATED ABSENCES

The following is a summary of changes in accrued compensated absences for the year ended June 30, 2007:

	Balance			Balance	Amounts Due
	July 1,			June 30,	Within
	2006	Additions	Deductions	2007	One Year
Accrued compensated absences	\$35,777	\$ 8,434	\$ (8,177)	\$ 36,034	\$ 13,142

NOTES TO FINANCIAL STATEMENTS

FOR THE YEAR ENDED JUNE 30, 2007

III. OTHER INFORMATION

A. DEFINED BENEFIT PENSION PLAN

Plan Description

The defined benefit pension plan is operated by the Municipal Employees Retirement System (MERS), which is an agent multiple-employer retirement system. MERS issues a publicly available financial report that includes financial statements and required supplemental information. That report may be obtained by writing to the Municipal Employees Retirement System of Michigan, 1134 Municipal Way, Lansing, MI 48917 or by calling (800) 767-6377.

Funding Policy

MERS funding policy provides for periodic employer contributions at actuarially determined rates that, expressed as percentages of annual covered payroll, are designed to accumulate sufficient assets to pay benefits when due. The Commission has responsibility for making actuarially determined contributions to the system. Participants may make voluntary contributions, however no employee contributions are required.

Annual Pension Costs

For the year ended June 30, 2007, the Commission's annual pension cost for MERS was more than the Commission's required contribution and less than the actual contribution made. Actual contributions to MERS for the year ending June 30, 2007 amounted to \$34,668. The pension benefit obligation was determined as part of an actuarial valuation of the plan as of December 31, 2005 using the entry age normal cost method. The actuarial assumptions include (a) a rate of return on the investment of present and future assets of 8.0% and, (b) projected salary increases of 4.5% per year compounded annually, attributable to inflation. The actuarial value of assets was determined using techniques that smooth the effects of short term volatility over a five year period.

NOTES TO FINANCIAL STATEMENTS

FOR THE YEAR ENDED JUNE 30, 2007

The Housing Commission's annual pension cost and net pension obligation to the plan for the current year were as follows:

Annual required contribution	\$ 22,668
Less: Interest on net pension asset	(1,068)
Plus: Adjustment to annual required contribution	 2,440
Annual pension cost	24,040
Contributions made	34,668
Increase in net pension asset	(10,628)
Net pension (asset), beginning of year	 (13,352)
Net pension (asset), end of year	\$ <u>(23,980</u>)

Three-Year Trend Information

Fiscal	Annual	Percentage	Net
Year	Pension	of APC	Pension
Ending	Cost (APC)	Contributed	Asset
6/30/05	\$22,116	100%	\$ 0
6/30/06	22,842	157%	13,352
6/30/0	24,040	144%	23,980

Schedule of Funding Progress

Actuarial	Actuarial	Actuarial Accrued	Unfunded			UAAL as a
Valuation	Value of	Liability (AAL)	AAL	Funded	Covered	Percentage
of Payroll	Assets	-Entry Age	(UAAL)	Ratio	Payroll	Covered
Date	<u>(a)</u>	(b)	(b-a)	(a/b)	(c)	(b-a/c)
12/31/04	\$168,433	\$360,118	\$191,685	47%	\$136,193	141%
12/31/05	203,354	404,608	201,254	50%	140,767	143%
12/31/06	264,236	459,130	194,894	58%	147,718	132%

B. RISK MANAGEMENT

The Commission is exposed to various risks of losses related to torts; theft of, damage to, and destruction of assets; errors and omissions; injuries to employees; and natural disasters. The Commission manages risk through the purchase of commercial insurance.

Liability, automotive, and property - The Commission is a member of the Municipal Underwriters of Michigan, which is an association organized to purchase commercial

NOTES TO FINANCIAL STATEMENTS

FOR THE YEAR ENDED JUNE 30, 2007

insurance for protection against loss for Michigan cities, counties, townships and special service governments. The Commission is insured up to the following limits: Liability - \$1,000,000, automotive - \$1,000,000, property - \$5,722,000, subject to deductibles of \$0, \$100, and \$250, respectively. The Commission is not subject to supplemental premium assessments by the association.

C. CONCENTRATION

The Commission's operations are concentrated in the multifamily real estate market. In addition, the Commission operates in a heavily regulated environment. The operations of the Commission are subject to the administrative directives, rules and regulations of federal, state, and local regulatory agencies, including, but not limited to, HUD. Such administrative directives, rules and regulations are subject to change by an act of state or federal legislature or an administrative change by HUD. Such changes may occur with little or inadequate funding to pay for the related costs, including additional administrative burden, to comply with a change.

D. FEDERAL GRANTS

The Commission has received several federal grants for specific purposes that are subject to review and audit by the grantor agencies. Although no amounts have been claimed, such audits could lead to requests for reimbursement to the grantor agency for expenditures disallowed under the terms of the grant. The Commission believes such disallowances, if any, will be immaterial.

* * * * * *

SUPPLEMENTARY INFORMATION

ST. LOUIS HOUSING COMMISSION FINANCIAL DATA SCHEDULE JUNE 30, 2007

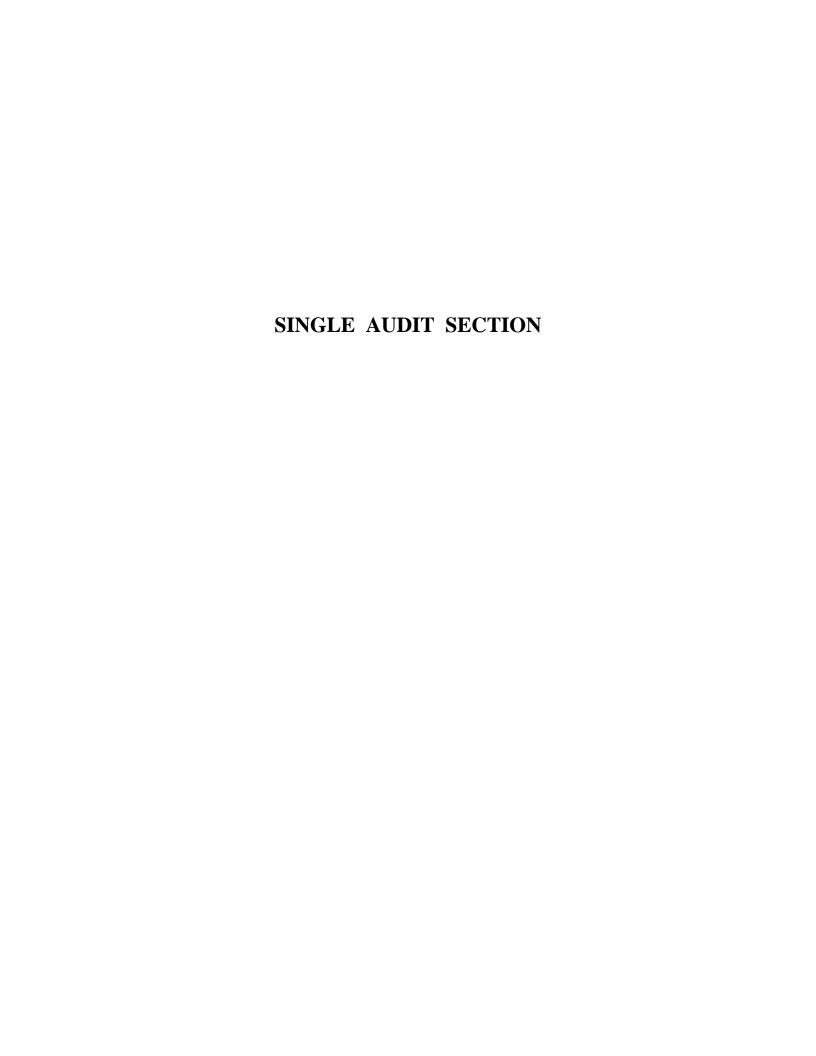
FDS Line		Public Housing Low Rent Program	Public Housing Capital Fund Program	Housing Choice Vouchers Program	Total
Item No.	ASSETS				
	Current assets				
111	Cash - unrestricted	\$ 255,184	\$ -	\$ 230,434	\$ 485,618
100	Total cash	255,184		230,434	485,618
	Receivables				
122	Accounts receivable - HUD other projects	-	30,000	-	30,000
126	Accounts receivable - Tenants - Dwelling rent	3,828	-	-	3,828
126.1	Allowance for doubtful accounts - dwelling rent	(404)	-	-	(404)
129	Accrued interest receivable			25	25_
120	Total receivables	3,424	30,000	25	33,449
	Other current assets				
142	Prepaid expenses and other assets	29,480	-	7,017	36,497
144	Interprogram due from	30,000		2,054	32,054
150	Total current assets	318,088	30,000	239,530	587,618
	Noncurrent assets				
161	Land	40,831	-	-	40,831
162	Buildings	3,381,234	116,769	-	3,498,003
163	Furniture, equipment & machinery - dwellings	47,678	11,426	-	59,104
164	Furniture, equipment & machinery - administration	116,697	-	18,947	135,644
165	Leasehold improvements	797,165	19,187	-	816,352
166	Accumulated depreciation	(3,238,144)	(4,151)	(18,947)	(3,261,242)
167	Construction in progress		30,000	<u> </u>	30,000
160	Total capital assets, net of accumulated depreciation	1,145,461	173,231		1,318,692
180	Total noncurrent assets	1,145,461	173,231		1,318,692
190	Total assets	\$ 1,463,549	\$ 203,231	\$ 239,530	\$ 1,906,310

ST. LOUIS HOUSING COMMISSION FINANCIAL DATA SCHEDULE (CONTINUED) JUNE 30, 2007

FDS		Public Housing Low Rent	Public Housing Capital Fund	Housing Choice Vouchers		
Line		Program	Program	Program	Total	
Item No.	LIABILITIES					
	Current liabilities					
312	Accounts payable	\$ 33,796	\$ -	\$ 363	\$ 34,159	
321	Accrued wages	9,037	-	3,058	12,095	
322	Accrued compensated absences	9,404	-	3,738	13,142	
333	Due to other governmental units	3,021	-	-	3,021	
341	Tenant security deposits	12,719	-	-	12,719	
342	Deferred revenue	671	-	-	671	
347	Interprogram due to	2,054	30,000		32,054	
310	Total current liabilities	70,702	30,000	7,159	107,861	
	Noncurrent liabilities					
354	Accrued compensated absences	16,991		5,901	22,892	
350	Total noncurrent liabilities	16,991		5,901	22,892	
300	Total liabilities	87,693	30,000	13,060	130,753	
	Equity/net assets					
508.1	Invested in capital assets	1,145,461	173,231	-	1,318,692	
512.1	Unrestricted	230,395		226,470	456,865	
513	Total equity/net assets	1,375,856	173,231	226,470	1,775,557	
600	Total liabilities and equity/net assets	\$ 1,463,549	\$ 203,231	\$ 239,530	\$ 1,906,310	

ST. LOUIS HOUSING COMMISSION FINANCIAL DATA SECTION FOR THE YEAR ENDED JUNE 30, 2007

FDS Line		L	ic Housing ow Rent Program	Cap	ic Housing bital Fund rogram	Choi	Housing ce Vouchers Program	 Total
Item No.								
703	Net tenant rental revenue	\$	142,714	\$	-	\$	-	\$ 142,714
704	Tenant revenue - other		1,041			-		 1,041
705	Total tenant revenue		143,755					 143,755
706 706.1	HUD PHA operating grants Capital grants		202,816		20,027 160,875		535,910	758,753 160,875
711	Investment income		8,645		100,073		640	9,285
715	Other revenue		949		_		040	949
					-		-	
716	Gain/(loss) on sale of capital assets		(375)					 (375)
700	Total revenue		355,790		180,902		536,550	 1,073,242
	Operating expenses							
911	Administrative salaries		48,216		540		36,863	85,619
912	Auditing fees		3,600		-		1,000	4,600
914	Compensated absences		232		_		26	258
915	Employee benefit contributions - administrative		22,000		41		16,156	38,197
							,	,
916	Other operating - administrative		14,979		4,300		17,209	36,488
924	Tenant services - other		253		-		-	253
931	Water		7,820		-		-	7,820
932	Electricity		17,262		-		-	17,262
933	Gas		51,201		-		-	51,201
938	Other utilities expense		2,860		-		-	2,860
941	Ordinary maintenance and operations - labor		61,369		_		_	61,369
942	Ordinary maintenance and operations - materials and other		17,244		_		_	17,244
943	Ordinary maintenance and operations - contract costs		13,972		4,960		_	18,932
945	Employee benefit contributions - ordinary maintenance		26,589		7,700		_	26,589
961	Insurance premiums		17,971		_		_	17,971
					-		-	
962	Other general expenses		100		-		-	100
963	Payments in lieu of taxes		3,021		-		-	3,021
964	Bad debt - tenant rents		3,888			-		 3,888
968	Total operating expenses		312,577		9,841		71,254	 393,672
970	Excess operating revenues over operating expenses		43,213		171,061		465,296	 679,570
972	Casualty losses - non-capitalized		410		_		_	410
973	Housing assistance payments		_		_		470,583	470,583
974	Depreciation		122,159		2,758		529	 125,446
900	Total expenses		435,146		12,599	_	542,366	 990,111
1001	Transfers in		10,186					10,186
			10,100		(10 196)		-	
1002	Transfers out		<u>-</u>		(10,186)			 (10,186)
1010	Total other financing sources (uses)		10,186		(10,186)			
1000	Excess (deficiency) of operating revenue over expenses		(69,170)		158,117		(5,816)	83,131
1103	Beginning of year equity		1,445,026		15,114		232,286	 1,692,426
	End of year equity	\$	1,375,856	\$	173,231	\$	226,470	\$ 1,775,557



ST. LOUIS HOUSING COMMISSION SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS FOR THE YEAR ENDED JUNE 30, 2007

FEDERAL GRANTOR PROGRAM TITLE	FEDERAL CFDA NUMBER	A	EDERAL WARDS PENDED
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT Low Rent Public Housing	14.850a	\$	202,816
Housing Choice Vouchers	14.871		535,910
Public Housing Capital Fund Program	14.872		180,902
TOTAL FEDERAL FINANCIAL ASSISTANCE		\$	919,628

NOTE 1 BASIS OF PRESENTATION

The accompanying schedule of expenditures of federal awards includes the federal grant activity of the St. Louis Housing Commission and is presented on the accrual basis of accounting. The information in this schedule is presented in accordance with the requirements of OMB Circular A-133, Audits of States, Local Governments, and Non-Profit Organizations. Therefore, some amounts presented in this schedule may differ from amounts presented in, or used in the preparation of, the financial statements.

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INDEPENDENT AUDITORS' REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE WITH

GOVERNMENT AUDITING STANDARDS

December 10, 2007

Board of Directors St. Louis Housing Commission St. Louis, Michigan

We have audited the financial statements of the business-type activities and each major fund of St. Louis Housing Commission as of and for the year ended June 30, 2007, and have issued our report thereon dated December 10, 2007. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States.

Internal Control Over Financial Reporting

In planning and performing our audit, we considered *St. Louis Housing Commission's* internal control over financial reporting as a basis for designing our auditing procedures for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Commission's internal control over financial reporting. Accordingly, we do not express an opinion on the effectiveness of the Commission's internal control over financial reporting.

A control deficiency exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect misstatements on a timely basis. A significant deficiency is a control deficiency, or combination of control deficiencies, that adversely affects the Commission's ability to initiate, authorize, record, process, or report financial data reliably in accordance with generally accepted accounting principles such that there is more than a remote likelihood that a misstatement of the Commission's financial statements that is more than inconsequential will not be prevented or detected by the Commission's internal control.

A material weakness is a significant deficiency, or combination of significant deficiencies, that results in more than a remote likelihood that a material misstatement of the financial statements will not be prevented or detected by the Commission's internal control.

Our consideration of internal control over financial reporting was for the limited purpose described in the first paragraph of this section and would not necessarily identify all deficiencies in internal control that might be significant deficiencies or material weaknesses. We did not identify any deficiencies in internal control over financial reporting that we consider to be material weaknesses, as identified above

Compliance and Other Matters

As part of obtaining reasonable assurance about whether *St. Louis Housing Commission's* financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

This report is intended solely for the information and use of the board of directors, management, the St. Louis City Council, the St. Louis Housing Commission and the Department of Housing and Urban Development and is not intended to be and should not be used by anyone other than these specified parties.

Rehmann Johann

INDEPENDENT AUDITORS' REPORT ON COMPLIANCE WITH REQUIREMENTS APPLICABLE TO EACH MAJOR PROGRAM AND ON INTERNAL CONTROL OVER **COMPLIANCE IN ACCORDANCE WITH OMB CIRCULAR A-133**

December 10, 2007

Board of Directors St. Louis Housing Commission St. Louis, Michigan

Compliance

We have audited the compliance of St. Louis Housing Commission with the types of compliance requirements described in the U.S. Office of Management and Budget (OMB) Circular A-133 Compliance Supplement that are applicable to each of its major federal programs for the year ended June 30, 2007. St. Louis Housing Commission's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs. Compliance with the requirements of laws, regulations, contracts, and grants applicable to each of its major federal programs is the responsibility of St. Louis Housing Commission's management. Our responsibility is to express an opinion on St. Louis Housing Commission's compliance based on our audit.

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in Government Auditing Standards, issued by the Comptroller General of the United States; and OMB Circular A-133, Audits of States, Local Governments, and Non-Profit Organizations. Those standards and OMB Circular A-133 require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about St. Louis Housing Commission's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances. We believe that our audit provides a reasonable basis for our opinion. Our audit does not provide a legal determination on St. Louis Housing Commission's compliance with those requirements.

In our opinion, St. Louis Housing Commission complied, in all material respects, with the requirements referred to above that are applicable to each of its major federal programs for the year ended June 30, 2007.

Internal Control Over Compliance

The management of *St. Louis Housing Commission* is responsible for establishing and maintaining effective internal control over compliance with requirements of laws, regulations, contracts and grants applicable to federal programs. In planning and performing our audit, we considered *St. Louis Housing Commission's* internal control over compliance with requirements that could have a direct and material effect on a major federal program in order to determine our auditing procedures for the purpose of expressing our opinion on compliance but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the Commission's internal control over compliance.

A control deficiency in an entity's internal control over compliance exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect noncompliance with a type of compliance requirement of a federal program on a timely basis. A *significant deficiency* is a control deficiency, or combination of control deficiencies, that adversely affects the entity's ability to administer a federal program such that there is more than a remote likelihood that noncompliance with a type of compliance requirement of a federal program that is more than inconsequential will not be prevented or detected by the Commission's internal control.

A material weakness is a significant deficiency, or combination of significant deficiencies, that results in more than a remote likelihood that material noncompliance with a type of compliance requirement of a federal program will not be prevented or detected by the Commission's internal control.

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and would not necessarily identify all deficiencies in internal control that might be significant deficiencies or material weaknesses. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses, as defined above.

This report is intended solely for the information and use of the board of directors, management, the St. Louis City Council, the St. Louis Housing Commission and the Department of Housing and Urban Development and is not intended to be and should not be used by anyone other than these specified parties.

Rehmann Lobson

SCHEDULE OF FINDINGS AND QUESTIONED COSTS

FOR THE YEAR ENDED JUNE 30, 2007

SECTION I - SUMMARY OF AUDITOR'S RESULTS

Financial Statements Type of auditor's report issued: Unqualified Internal controls over financial reporting: ____yes X no Material weakness(es) identified? Significant deficiencies identified not _____ yes ___X ___ none reported considered to be material weaknesses? Noncompliance material to financial _____ yes ___**X**__ no statements noted? Federal Awards Internal Control over major programs: Material weakness(es) identified? _____ yes ___**X**___no Significant deficiencies identified not considered to be material weaknesses? yes X none reported Type of auditor's report issued on compliance for major programs: **Unqualified** Any audit findings disclosed that are required to be reported in accordance with Circular A-133, _____ yes ___**X**__ no Section 510(a)? **Identification of Major Programs: CFDA Number(s)** Name of Federal Program or Cluster

14.871 **Housing Choice Vouchers**

SCHEDULE OF FINDINGS AND QUESTIONED COSTS

FOR THE YEAR ENDED JUNE 30, 2007

Dollar threshold used to distinguish between Type A and Type B programs:	<u>\$300,000</u>
Auditee qualified as low-risk auditee?	X yes no
SECTION II – FINANCIAL STATEMENT FIN	NDINGS
None.	
SECTION III – FEDERAL AWARD FINDING	S AND QUESTIONED COSTS
None.	
PRIOR YEAR FINDINGS	
None.	